Statement of Basis of the Federal Operating Permit

INEOS USA LLC

Site Name: Stratton Ridge Facility
Physical Location: 5 Miles South of the Intersection of FM 523 and FM 2004
Nearest City: Clute
County: Brazoria

Permit Number: O3597 Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 424710
NAICS Name: Petroleum Bulk Stations and Terminals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status: and

A list of available unit attribute forms.

Prepared on: January 30, 2019

Operating Permit Basis of Determination

Permit Area Process Description

The Stratton Ridge facility is a hydrocarbon feedstock storage and distribution terminal consisting of eight (8) underground storage caverns and associated product conditioning and transmission facilities. The salt dome caverns are used to store ethylene, propylene, butylene, and mixtures of ethane and propane. All hydrocarbon feedstocks are transported into and out of the site by pipeline.

The caverns "float" on pipeline network from which product storage or delivery is dictated by pipeline pressure. As the pipeline pressure increases, products are delivered to the caverns, and as the pipeline pressure decreases, products are returned back to the pipeline. Cavern head is maintained by brine injection or brine displacement from the caverns. Incoming hydrocarbon products are delivered to the caverns by pumping out equivalent volumes of brine. Similarly, product may be retrieved from the caverns by displacing with equivalent volume of brine from the brine storage pond.

In order to meet product specifications, hydrocarbon products withdrawn from the wells must be dried. Product drying is accomplished by passing through a coalescer and a molecular sieve dryer prior to entering the pipeline.

During product withdrawal from storage, the displaced brine is degassed to remove entrained hydrocarbon vapors prior to return to the storage pond (or directly to a different cavern). Brine degassing is accomplished by separation in an atmospheric tower and/or vacuum tower. Hydrocarbon vapors from the degassing system are vented to the flare.

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O3302

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, NOX, CO

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

- Additional Monitoring Requirements
- New Source Review Authorization Requirements
- Compliance Requirements
- Protection of Stratosphere Ozone
- o Permit Location
- Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - o Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use

control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or

chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO ₂ Trading Program)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to

which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
FS-803	30 TAC Chapter 117, Subchapter B	R7300-0001	Type of Service = Existing diesel fuel-fired engine, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average that has not been modified, reconstructed or relocated on or after October 1, 2001
FS-803	40 CFR Part 60, Subpart IIII	60IIII-01	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before 07/11/2005.
FS-803	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than or equal to 250 HP and less than 300 HP. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE. Service Type = Limited use.
			Stationary RICE Type = Compression ignition engine
SG-0813A	30 TAC Chapter 117, Subchapter B	R7300-0001	Type of Service = New, modified, reconstructed or relocated diesel fuel-fired engine, placed into service on or after October 1, 2001, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average
SG-0813A	40 CFR Part 60, Subpart IIII	601111-01	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005. Diesel = Diesel fuel is used. Kilowatts = Power rating greater than or equal to 130 KW and less than or equal to 368 KW. Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement. Displacement = Displacement is less than 10 liters per cylinder and engine is a constant-speed engine. Service = CI ICE is an emergency engine. Standards = The emergency CI ICE meets the standards applicable to non-emergency engines. Commencing = CI ICE was newly constructed after 07/11/2005. Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions. Manufacture Date = Date of manufacture was after 04/01/2006. Model Year = CI ICE was manufactured in model year 2010.
SG-0813A	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than or equal to 250 HP and less than 300 HP. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.
SG-0813B	30 TAC Chapter 117, Subchapter B	R7300-0001	Type of Service = New, modified, reconstructed or relocated diesel fuel-fired engine, placed into service on or after October 1, 2001, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average

Unit ID	Regulation	Index Number	Basis of Determination*
SG-0813B	SG-0813B 40 CFR Part 60, 60		Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005.
	Subpart IIII		Diesel = Diesel fuel is used.
			Kilowatts = Power rating greater than or equal to 130 KW and less than or equal to 368 KW.
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.
			Displacement = Displacement is less than 10 liters per cylinder and engine is a constant-speed engine.
			Service = CI ICE is an emergency engine.
			Standards = The emergency CI ICE meets the standards applicable to non-emergency engines.
			Commencing = CI ICE was newly constructed after 07/11/2005.
			Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.
			Manufacture Date = Date of manufacture was after 04/01/2006.
			Model Year = CI ICE was manufactured in model year 2010.
SG-0813B	40 CFR Part 63,	63ZZZZ-0001	HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2
	Subpart ZZZZ		Brake HP = Stationary RICE with a brake HP greater than or equal to 250 HP and less than 300 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.
SG-0813C	30 TAC Chapter 117, Subchapter B	R7300-0001	Type of Service = New, modified, reconstructed or relocated diesel fuel-fired engine, placed into service on or after October 1, 2001, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average
SG-0813C	40 CFR Part 60, Subpart IIII	601111-01	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after 07/11/2005. Diesel = Diesel fuel is used.
			Kilowatts = Power rating greater than or equal to 130 KW and less than or equal to 368 KW.
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.
			Displacement = Displacement is less than 10 liters per cylinder and engine is a constant-speed engine.
			Service = CI ICE is an emergency engine.
			Standards = The emergency CI ICE meets the standards applicable to non-emergency engines.
			Commencing = CI ICE was newly constructed after 07/11/2005.
			Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.
			Manufacture Date = Date of manufacture was after 04/01/2006.
			Model Year = CI ICE was manufactured in model year 2010.
SG-0813C	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-0001	HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2 Brake HP = Stationary RICE with a brake HP greater than or equal to 250 HP and less than 300 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.
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Unit ID	Regulation	Index Number	Basis of Determination*
SM-404	30 TAC Chapter 117, Subchapter B	R7300-0001	Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)]
			Fuel Fired = Petroleum-based diesel fuel
SM-404	40 CFR Part 60, Subpart IIII	60IIII-01	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before 07/11/2005.
SM-404	40 CFR Part 63,	63ZZZZ-0001	HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2
	Subpart ZZZZ		Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.
			Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).
			Stationary RICE Type = Compression ignition engine
SP-101C	30 TAC Chapter 117, Subchapter B	R7300-0001	Type of Service = Existing diesel fuel-fired engine, located in the Houston/Galveston/Brazoria ozone nonattainment area, operated less than 100 hours/year, on a rolling 12-month average that has not been modified, reconstructed or relocated on or after October 1, 2001
SP-101C	40 CFR Part 60, Subpart IIII	601111-01	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before 07/11/2005.
SP-101C	40 CFR Part 63,	63ZZZZ-0001	HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2
	Subpart ZZZZ		Brake HP = Stationary RICE with a brake HP less than 100 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.
			Service Type = Limited use.
			Stationary RICE Type = Compression ignition engine
SF802B	30 TAC Chapter 115, Storage of	R5112-0001	Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.
	VOCs		Tank Description = Tank does not require emission controls
			Product Stored = VOC other than crude oil or condensate
			True Vapor Pressure = True vapor pressure is less than 1.0 psia
			Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
SF-601	30 TAC Chapter 117, Subchapter B	R7300-0001	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent. Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).
			Unit Type = Process heater

Unit ID	Regulation	Index Number	Basis of Determination*
			CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option Maximum Rated Capacity = Maximum rated capacity is at least 2 MMBtu/hr, but less than 40 MMBtu/hr. CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS. NOx Emission Limit Basis = Emission limit in lb/hr (or ppm by volume at 15% oxygen, dry basis) on a block one-hour average NOx Reduction = No NO _x control method Fuel Type #1 = Natural gas NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000] NOx Emission Limitation = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(8)
SF-602	30 TAC Chapter 117, Subchapter B	R7300-0001	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent. Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). Unit Type = Process heater CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option Maximum Rated Capacity = Maximum rated capacity is at least 2 MMBtu/hr, but less than 40 MMBtu/hr. CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS. NOx Emission Limit Basis = Emission limit in lb/hr (or ppm by volume at 15% oxygen, dry basis) on a block one-hour average NOx Reduction = No NO _x control method Fuel Type #1 = Natural gas NOx Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000] NOx Emission Limitation = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(8)
SM-701	30 TAC Chapter 111, Visible Emissions	R1111-0001	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
SM-701	30 TAC Chapter 115, HRVOC Vent Gas	R5720-0001	Out of Service = Flare was not permanently out of service by April 1, 2006. Total Gas Stream = Flare receives a total gas stream with greater than 100 ppmv HRVOC at some time. Gas Stream Concentration = Flare receives a gas stream containing 5% or greater HRVOC by weight at some time. Alternative Monitoring = No alternative monitoring and test methods are used. Minor Modification = No minor modifications to the monitoring and test methods are used. Tank Service = Flare is not in dedicated service for storage tanks with 95% or greater of an individual HRVOC. Flare Type = Flare is complying with the requirements of § 115.725(d) to demonstrate compliance.
SM-701	40 CFR Part 60, Subpart A	60A-0001	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18. Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type = Air-assisted

Unit ID	Regulation	Index Number	Basis of Determination*
SM-701	40 CFR Part 63, Subpart A	63A-0001	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.
SM-701A	30 TAC Chapter 111, Visible Emissions	R1111-0001	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
SM-701A	30 TAC Chapter 115, HRVOC Vent Gas	R5720-0001	Out of Service = Flare was not permanently out of service by April 1, 2006. Total Gas Stream = Flare receives a total gas stream with greater than 100 ppmv HRVOC at some time. Gas Stream Concentration = Flare receives a gas stream containing 5% or greater HRVOC by weight at some time. Alternative Monitoring = No alternative monitoring and test methods are used. Minor Modification = No minor modifications to the monitoring and test methods are used. Tank Service = Flare is not in dedicated service for storage tanks with 95% or greater of an individual HRVOC. Flare Type = Flare is complying with the requirements of § 115.725(d) to demonstrate compliance.
SM-701A	40 CFR Part 60, Subpart A	60A-0001	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18. Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4). Flare Assist Type = Air-assisted
SM-701A	40 CFR Part 63, Subpart A	63A-0001	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.
SM-701A-V	30 TAC Chapter 115, HRVOC Vent Gas	R5720-0001	HRVOC Concentration = The vent gas stream has a HRVOC concentration of at least 100 ppmv at some times. Max Flow Rate = The vent gas stream has a maximum potential flow rate greater than 100 dry standard cubic feet per hour (ft3/hr). Vent Gas Stream Control = Vent gas stream is controlled by a flare.
SM-701A-V	30 TAC Chapter 115, Vent Gas Controls	R5121	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.
SM-701-V	30 TAC Chapter 115, HRVOC Vent Gas	R5720-0001	HRVOC Concentration = The vent gas stream has a HRVOC concentration of at least 100 ppmv at some times. Max Flow Rate = The vent gas stream has a maximum potential flow rate greater than 100 dry standard cubic feet per hour (ft3/hr). Vent Gas Stream Control = Vent gas stream is controlled by a flare.

Unit ID	Regulation	Index Number	Basis of Determination*
SM-701-V	V 30 TAC Chapter R5121		Alternate Control Requirement = Alternate control is not used.
	115, Vent Gas Controls		Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.
			Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.
			Control Device Type = Smokeless flare
			Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.
DGRMTSHO	DGRMTSHO 30 TAC Chapter R5412-0001		Solvent Degreasing Machine Type = Cold solvent cleaning machine.
Р	115, Degreasing Processes	g	Alternate Control Requirement = The TCEQ Executive Director has not approved an alternative control requirement as allowed under 30 TAC § 115.413 or not alternative has been requested.
			Solvent Sprayed = No solvent is sprayed.
			Solvent Vapor Pressure = Solvent vapor pressure is less than or equal to 0.6 psia as measured at 100 degrees Fahrenheit.
			Solvent Heated = The solvent is not heated to a temperature greater than 120° F.
			Parts Larger than Drainage = No cleaned parts for which the machine is authorized to clean are larger than the internal drainage facility of the machine.
			Drainage Area = Area is greater than or equal to 16 square inches.
			Disposal in Enclosed Containers = Waste solvent is properly disposed of in enclosed containers.
SR-PAINT	30 TAC Chapter	R5450-0001	Exemption = No exemption is being met.
	115, Subchapter E, Division 5		Alternative Control = No alternative control is being used.
	E, DIVISION 5		Low Usage = All surface coating operations on the property when uncontrolled emit a combined weight of VOC of less than 3 pounds per hour and less than 15 pounds in any consecutive 24-hour period.

^{* -} The "unit attributes" or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the "as applicable" language. The "as applicable" language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

New Source Review Authorization References

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.		
Authorization No.: 535	Issuance Date: 07/31/2015	
Permits By Rule (30 TAC Chapter 106) for the	Application Area	
Number: 106.261	Version No./Date: 11/01/2003	
Number: 106.263	Version No./Date: 11/01/2001	
Number: 106.355	Version No./Date: 11/01/2001	
Number: 106.373	Version No./Date: 09/04/2000	
Number: 106.412	Version No./Date: 09/04/2000	
Number: 106.433	Version No./Date: 09/04/2000	
Number: 106.452	Version No./Date: 09/04/2000	
Number: 106.472	Version No./Date: 03/14/1997	
Number: 106.472	Version No./Date: 09/04/2000	
Number: 106.473	Version No./Date: 03/14/1997	
Number: 106.511	Version No./Date: 09/04/2000	

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

- 1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
- 2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
- 3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information			
ID No.: SM-701A-V			
Control Device ID No.: SM-701A	Control Device Type: Flare		
Applicable Regulatory Requirement			
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R5121		
Pollutant: VOC	Main Standard: § 115.122(a)(1)		
Monitoring Information			
Indicator: Pilot Flame			
Minimum Frequency: Continuous			
Averaging Period: n/a			
Deviation Limit: It shall be considered a deviation if there is a loss of pilot flame.			
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.			

Unit/Group/Process Information ID No.: SM-701A-V Control Device ID No.: SM-701A Control Device Type: Flare Applicable Regulatory Requirement Name: 30 TAC Chapter 115, HRVOC Vent Gas SOP Index No.: R5720-0001 Pollutant: Highly Reactive VOC Main Standard: § 115.727(f) Monitoring Information Indicator: Pilot Flame Minimum Frequency: Continuous

Averaging Period: n/a

Deviation Limit: It shall be considered a deviation if there is a loss of pilot flame.

Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.

Unit/Group/Process Information ID No.: SM-701-V Control Device ID No.: SM-701 Control Device Type: Flare **Applicable Regulatory Requirement** Name: 30 TAC Chapter 115, Vent Gas Controls SOP Index No.: R5121 Pollutant: VOC Main Standard: § 115.122(a)(1) **Monitoring Information** Indicator: Pilot Flame

Minimum Frequency: Continuous

Averaging Period: n/a

Deviation Limit: It shall be considered a deviation if there is a loss of pilot flame.

Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.

Unit/Group/Process Information			
ID No.: SM-701-V			
Control Device ID No.: SM-701	Control Device Type: Flare		
Applicable Regulatory Requirement	·		
Name: 30 TAC Chapter 115, HRVOC Vent Gas	SOP Index No.: R5720-0001		
Pollutant: Highly Reactive VOC	Main Standard: § 115.727(f)		
Monitoring Information			
Indicator: Pilot Flame			
Minimum Frequency: Continuous			
Averaging Period: n/a			
Deviation Limit: It shall be considered a deviation if there is a loss of pilot flame.			
Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras			

Basis of CAM: It is widely practiced and accepted to monitor the flare pilot flame by closed circuit cameras, thermocouples and visual inspection. The presence of the pilot flame demonstrates that VOC emissions are combusted. Monitoring the presence of a pilot flame is required in many federal rules, including: 40 CFR Part 60, Subparts K, III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; and 40 CFR Part 63, Subparts G, R, W, DD, and HH.

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information					
ID No.: DGRMTSHOP					
Control Device ID No.: N/A	Control Device Type: N/A				
Applicable Regulatory Requirement					
Name: 30 TAC Chapter 115, Degreasing Processes	SOP Index No.: R5412-0001				
Pollutant: VOC	Main Standard: § 115.412(1)				
Monitoring Information					
Indicator: Visual Inspection					
Minimum Frequency: Monthly					

Averaging Period: n/a

Deviation Limit: A deviation is considered to be any monitoring data not in compliance with the applicable requirements of 30 TAC § 115.412(1)(A)-(F).

Basis of monitoring:

The monitoring option to cover cold cleaner or the open-top vapor cleaner was included in the EPA "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources. In addition to covering the cleaner records of monthly inspections of equipment is an effective way to ensure that the system is operating in accordance with its design.

Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (https://www.tceq.texas.gov/goto/cfr-online). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical rules/old106list/index106.html

Historical Standard Exemption lists may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceg.texas.gov/permitting/air/nav/air pbr.html

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on <u>December 10, 2018.</u>
Site rating: <u>0.25 / Satisfactory</u> Company rating: <u>4.02 / Satisfactory</u>
(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. Has the permit changed on the basis of the compliance history or site/company rating?N

Site/Permit Area Compliance Status Review

1.	Were there any out-of-compliance units listed on Form OP-ACPS?	N	(
	Is a compliance plan and schedule included in the permit?		

Available Unit Attribute Forms

OP-UA1 -	Miscellaneous	and Generic	Unit A	ttributes
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- OP-UA2 Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 Storage Tank/Vessel Attributes
- OP-UA4 Loading/Unloading Operations Attributes
- OP-UA5 Process Heater/Furnace Attributes
- OP-UA6 Boiler/Steam Generator/Steam Generating Unit Attributes
- OP-UA7 Flare Attributes
- **OP-UA8 Coal Preparation Plant Attributes**
- OP-UA9 Nonmetallic Mineral Process Plant Attributes
- OP-UA10 Gas Sweetening/Sulfur Recovery Unit Attributes
- **OP-UA11 Stationary Turbine Attributes**
- OP-UA12 Fugitive Emission Unit Attributes
- OP-UA13 Industrial Process Cooling Tower Attributes
- **OP-UA14 Water Separator Attributes**
- OP-UA15 Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
- OP-UA16 Solvent Degreasing Machine Attributes
- OP-UA17 Distillation Unit Attributes
- OP-UA18 Surface Coating Operations Attributes

- OP-UA19 Wastewater Unit Attributes
- OP-UA20 Asphalt Operations Attributes
- OP-UA21 Grain Elevator Attributes
- OP-UA22 Printing Attributes
- OP-UA24 Wool Fiberglass Insulation Manufacturing Plant Attributes
- OP-UA25 Synthetic Fiber Production Attributes
- OP-UA26 Electroplating and Anodizing Unit Attributes
- OP-UA27 Nitric Acid Manufacturing Attributes
- OP-UA28 Polymer Manufacturing Attributes
- OP-UA29 Glass Manufacturing Unit Attributes
- OP-UA30 Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
- OP-UA31 Lead Smelting Attributes
- OP-UA32 Copper and Zinc Smelting/Brass and Bronze Production Attributes
- OP-UA33 Metallic Mineral Processing Plant Attributes
- OP-UA34 Pharmaceutical Manufacturing
- OP-UA35 Incinerator Attributes
- OP-UA36 Steel Plant Unit Attributes
- OP-UA37 Basic Oxygen Process Furnace Unit Attributes
- OP-UA38 Lead-Acid Battery Manufacturing Plant Attributes
- OP-UA39 Sterilization Source Attributes
- OP-UA40 Ferroalloy Production Facility Attributes
- OP-UA41 Dry Cleaning Facility Attributes
- OP-UA42 Phosphate Fertilizer Manufacturing Attributes
- OP-UA43 Sulfuric Acid Production Attributes
- OP-UA44 Municipal Solid Waste Landfill/Waste Disposal Site Attributes
- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- **OP-UA58 Treatment Process Attributes**
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes